

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND
NORTHERN DIVISION

JEFFREY LILLY, *et al.*,

Plaintiffs,

vs.

BALTIMORE POLICE DEPARTMENT, *et al.*,

Defendants

JEFFREY LILLY and RAQUEL LILLY,

Plaintiffs

v.

C.A. No.: 1:22-cv-02752-BAH

MICHAEL HARRISON,
BRIAN NADEAU,
OLUFEMI AKANNI,
JASON CALLAGHAN,
LAMAR HOWARD,
DANIEL POPP, and
KENNETH THOMPSON

Defendants.

C.A. No.: 1:25-cv-00240-BAH

**PLAINTIFFS' RESPONSE TO THE COURT'S JULY 7, 2025, ORDER REGARDING
MOTION TO CONSOLIDATE**

Plaintiffs, by and through undersigned counsel, respectfully submit this response pursuant to the Court's July 7, 2025, Order directing the parties to address the impact, if any, of the Court's Memorandum Opinion in *Lilly v. BPD et al.*, Case No. 22-2752-BAH, ECF 92, on Plaintiffs' pending Motion to Consolidate (ECF 24).

The Plaintiffs respectfully contend that the Court's granting of summary judgment in Case No. 22-2752-BAH does not render the Motion to Consolidate moot. Rather, consolidation

remains an appropriate and efficient mechanism to promote judicial economy and streamline resolution of the overlapping claims and factual allegations presented in *Lilly v. Harrison et al.*, Case No. 25-240-BAH.

Plaintiffs continue to seek the earliest possible trial date in this action. Consolidation serves that goal. Substantial discovery—including depositions, interrogatories, and document production—has already been completed in the earlier action, and that record is directly relevant and material to the issues to be tried in the current case. Plaintiffs are not seeking additional discovery. Instead, Plaintiffs ask that the evidentiary record developed in *Lilly v. BPD et al.*, 22-2752-BAH, be fully incorporated into the present matter so that this case may proceed promptly to trial on the remaining claims.

Accordingly, Plaintiffs maintain that consolidation would conserve judicial and party resources, avoid duplication of efforts, and allow for resolution of all related issues in a coordinated and expeditious fashion. Plaintiffs respectfully request that the Motion to Consolidate be GRANTED and that a prompt trial date be scheduled in this matter.

Dated: July 18, 2025

Respectfully submitted,

Plaintiffs,

/s/ Patrick B. Jennings
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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of July, 2025, a copy of the Plaintiffs' Response to the Court's July 7, 2025, Order Regarding Motion to Consolidate was filed with the United States District Court for the District of Maryland and was served on all counsel of record, electronically, via the Court's CM/ECF e-filing system.

/s/ Patrick B. Jennings
Patrick B. Jennings (Bar No. 30362)

July 18, 2025

